

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiff,

v.

THE REPUBLIC OF CUBA,

Defendant.

Case No. 12-CV-01596
(AKH)

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.; and

JEANETTE FULLER HAUSLER, and WILLIAM FULLER as
court-appointed co-representatives of the ESTATE OF ROBERT
OTIS FULLER, deceased, on behalf of all beneficiaries of the
Estate and the ESTATE OF ROBERT OTIS FULLER; and

ALFREDO VILLOLDO, individually, and
GUSTAVO E. VILLOLDO, individually and as Administrator,
Executor, and Personal Representative of the ESTATE OF
GUSTAVO VILLOLDO ARGILAGOS,

Petitioners,

v.

BANCO BILBAO VIZCAYA ARGENTARIA (S.A.); BANK OF
AMERICA N.A.; BANK OF NEW YORK MELLON;
BARCLAY'S BANK PLC; CITIBANK N.A.; CREDIT SUISSE
AG, NEW YORK BRANCH; DEUTSCHE BANK TRUST
COMPANY AMERICAS; HSBC BANK (HSBC BANK USA,
N.A.); INTESA SANPAOLO S.P.A.; JP MORGAN CHASE
BANK, N.A.; RBS CITIZENS, N.A.; ROYAL BANK OF
CANADA; SOCIETE GENERALE; UBS AG; WELLS FARGO
BANK, NA; BROWN BROTHERS HARRIMAN & CO.;
MERCANTIL COMMERCEBANK, N.A.; STANDARD
CHARTERED BANK; AND BANCO SANTANDER, S.A.,

Respondents/Garnishees.

**DECLARATION OF
BRANDON LEVITT IN
SUPPORT OF
PETITIONERS'
MEMORANDUM OF
LAW IN OPPOSITION
TO GARNISHEE
BANKS' MOTION FOR
RECONSIDERATION
AND STAY**

BRANDON R. LEVITT hereby declares:

1. I am a member of the Bar of this Court and an associate of the firm Hall, Lamb & Hall P.A. We, along with the Frankfurt Kurnit firm, are counsel of record to Alfredo Villoldo, individually, and Gustavo E. Villoldo, individually, and as Administrator, Executor, and Personal Representative of the Estate of Gustavo Villoldo Agrilagos, Petitioners in this judgment enforcement proceeding. The facts set forth herein are based on personal knowledge that I have obtained as counsel to the Villoldos and from my familiarity with the records referenced below.

2. I submit this declaration in support of Petitioners' Memorandum of Law in Opposition to Garnishee Banks' Motion for Reconsideration and Stay.

3. Attached to this declaration are true and correct copies of the following exhibits in support of Petitioners' Memorandum of Law:

Exhibit A: November 15, 2014 Hearing Transcript.

Exhibit B: Information in the case of *United States of America v. HSBC Bank USA, N.A. and HSBC Holdings, plc* (Case No. 1:12-cr-00763-JG).

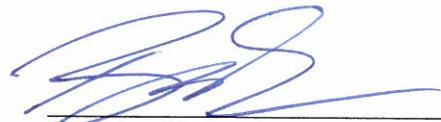
Exhibit C: Deferred Prosecution Agreement in the case of *United States of America v. HSBC Bank USA, N.A. and HSBC Holdings, plc* (Case No. 1:12-cr-00763-JG).

Exhibit D: Barclays Bank PLC Settlement Agreement.

Exhibit E: JPMorgan Chase Bank, N.A. Settlement Agreement.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: Miami, Florida
April 7, 2015



Brandon R. Levitt